

REMARKS

. Applicant has amended claims 1-4, 9 and 11 to better define the invention. Applicant respectfully traverses the rejection of the claims over the cited art and respectfully requests reconsideration.

Claim 1 as amended requires a casing gripping clamp with a primary seal that seals between the inner diameter of the spear and the inner wall of the joint of the casing. Claim 1 requires a secondary seal carried on the spear axially above the primary seal and free of contact with the primary seal.

Taylor discloses in Figure 12 a primary seal 152 that seals against the inner diameter of a tubular member 146. Applicant submits that packer cup backup 150 is not a secondary seal. Applicant submits that packer cup backup 150 is a metal reinforcing member to prevent the pressure from below cup seal 152 from over-deforming cup seal 152. Without packer cup backup 150, the conical portion of seal 152 could possible over deform and flip upward, allowing upward flow to flow through. Packer cup backup 150 is a retainer that prevents the over-deformation. The assemblies of applicant's cup seals also have a metal retainer, such as by retainer 150 in Figure 4. Retainer ring 150 in Figure 4 is a metal member that prevents over-deformation of the expandable primary seal 142. Packer cup backup 150 of Figure 12 of Taylor is thus part of the assembly of the primary seal 152 and not a secondary seal. Moreover, it is in full contact with primary seal 152, not spaced axially above and out of contact as required by claim 1.

Claim 2 depends from claim 1, specifying that the secondary seal is a passive seal operable by pressure differential across the secondary seal due to a failure of the primary seal to contain drilling fluid pressure below the primary seal. Applicants submits that packer cup

backup 150 would not deform out and touch the inner diameter of tubular member 146 in response to any pressure from below primary seal 152.

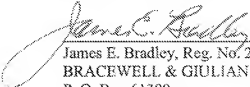
Claim 3 depends from claim 2, requiring that the primary and secondary seals comprise cup seals. Claim 4 depends from claim 3, specifying that the secondary seal has substantially the same dimensions as the primary seal. Packer cup backup 150 does not have the same dimensions as primary seal 152.

Claim 9 requires a secondary seal element about the spear above and axially spaced out of contact with the primary seal element. It requires that the secondary seal element be selectively operable to create a seal between the spear and the inner wall of the casing joint in the event the primary seal element fails. Packer cup retainer 150 is not spaced above and out of contact with seal 152. It is not operable to create a seal between the spear and the inner wall of the casing joint. Claim 11 depends from claim 9, specifying that each of the primary and secondary seal elements has substantially the same dimensions and comprises a cup seal.

Applicant submits that claims 1 and 9 are generic as to the withdrawn claims. Applicant requests that these claims be reinstated and that applicant be allowed to amend these withdrawn claims to conform antecedents and other amended language.

Respectfully submitted,

Date: August 7, 2009



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